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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

United States Courts Southern District of Texas **FILED**

June 09, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA 88888 v.

SEALED CHRISTOPHER EDWARDS DOWELL

4:22-cr-270

INDICTMENT

Criminal No.

THE GRAND JURY CHARGES:

COUNT ONE Deprivation of Rights Under Color of Law (18 U.S.C. § 242)

On or about February 10, 2020, in the Southern District of Texas, Houston Division, and within the jurisdiction of the Court, the Defendant,

CHRISTOPHER EDWARDS DOWELL,

while acting under color of law as an officer with U.S. Customs and Border Protection, and acting without a legitimate purpose, touched Victim A's breasts without her consent, thereby willfully depriving Victim A of liberty without due process of law, which includes the right to bodily integrity, a right secured and protected by the Constitution and the laws of the United States, in violation of 18 U.S.C. § 242.

COUNT TWO Destruction, Alteration, or Falsification of Records in Federal Investigations (18 U.S.C. § 1519)

On or about February 10, 2020, in the Southern District of Texas, Houston Division, and within the jurisdiction of the Court, the Defendant,

CHRISTOPHER EDWARDS DOWELL,

knowingly concealed, covered up, falsified, and made false entries in a record and document,

specifically a Secondary Inspection Report, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Department of Homeland Security – Office of Inspector General, an agency of the United States, in violation of 18 U.S.C. § 1519.

A TRUE BILL:

Original Signature on File

GRAND JURY FOREPERSON

JENNIFER B. LOWERY United States Attorney

Eun Kate Suh Luis Batarse

Assistant United States Attorneys